In the outstanding Office Action, paragraph 2, the Examiner points out that the application has been filed with informal drawings, which are acceptable for examination purposes only. Formal drawings will be required when the application is allowed.

The Applicants respectfully submit that formal drawings will be provided at or before the time of allowance.

In the outstanding Office Action, paragraph 4, claims 1-4, 6-12, and 14-16 are rejected under 35 U.S.C. 103(a) as being unpatentable over Killcommons et al. (hereinafter Killcommons), US 6424996 B1, and De Bonet, US 5819288.

In the outstanding Office Action, paragraph 5, claims 5 and 13 are rejected under 35 U.S.C. 103(a) as being unpatentable over Killcommons and De Bonet as applied to claims 4 above, and further in view of Computer Dictionary, Third edition, Microsoft Press, 1997, ISBN 1-57231-446-X, p. 462.

Section 2142 of the MPEP states that in order for a prima facie case of obviousness to be established, three basic criteria must be met, one of which is that the reference or combinations of references must teach or suggest all the claim limitations.

The Applicants respectfully submit that the pending claims define allowable subject matter and, therefore, the rejections should be removed.

With regard to the rejection of claim 1 being unpatentable over Killcommons and De Bonet set forth in paragraph 4 of the Office Action, Applicants respectfully traverse. Applicants submit that the combination of Killcommons and De Bonet does not teach or suggest the claimed invention. In the outstanding Office action, the Examiner admits that Killcommons does not specifically teach storing first or second stored identification data on the server in response to the first and second identification data as provided by the first or second interface. Also, Applicants

respectfully submit that the combination of Killcommons and De Bonet does not teach or suggest storing first stored identification data on the server in response to the first identification data, storing second stored identification data on the server in response to the second identification data, and viewing said first and second identification data by accessing said first and second identification data in the server through said network, as does the invention of claim 1 of the present application.

De Bonet describes a system and method for classifying a query image(s) with respect to a database of stored images (i.e., test images) in order to access images from the database that are similar to the query image(s) (column 6 lines 6-16). As described in column 13 lines 16-67 and column 14 line 1-34, De Bonet computes a variance vector of a query image(s), and computes a test image signature for every image in the image database 446. Each test image in the image database 446 has a corresponding pointer also stored in the image database 446. A test image signature and a pointer associated with a corresponding test image are moved to a temporary database 476. However, the pointer is not displayed and viewed by a user. A similarity measure is computed for the test image using the variance vector and the test image signature. This process is repeated for each test image in the image database 446. As a result, the pointers end up being stored in two places, the image database 446 and the temporary database 476. The test image in the image database 446 having the highest similarity to the query image(s) is retrieved from the image database 446 by using the pointer of the test image that was stored in the temporary database 476. De Bonet is not trying to find and access the query image. Instead, De Bonet provides a query image(s) at the start. De Bonet is trying to find images in the database 446 that are similar to the query image(s). That is, the user in De Bonet provides an image(s) (a query image(s)) and tries to find images in the image database 446 that are similar to the query image(s).

3

De Bonet does not teach or suggest viewing stored identification data that is stored on a single server at a single location independent of where the image data is stored, as does the invention of claim 1 of the present application, in order to retrieve an image associated with the viewed identification data. Instead, De Bonet describes computing a similarity measure in order to find images in a database that are similar to a query image(s). Pointers are associated with each image in the database but are not displayed and viewed. The pointers are stored in the image database 446 and are also stored in a temporary database 476, thus existing in two locations during the image acquisition process of De Bonet. Also, Killcommons does not teach or suggest viewing stored identification data since it has already been established herein, as admitted by the Examiner in the outstanding Office action, that Killcommons does not teach storing first or second stored identification data on the server in response to the first and second identification data as provided by the first or second interface.

The claimed invention stores all image-related identification data at one site on one server independent of where the associated images are stored. As a result, the claimed invention allows imaging data that is stored at multiple sites on a network to be accessed from those multiple sites by searching for the associated identification data at only one site. Referring to Fig. 1 of the application, all identification data is stored at a first location 1 on information management server (IMS) 40. However, imaging data may be stored at multiple sites (e.g., sites 1 and 1A, see Fig. 1) on the network 10 on different image storage units (ISUs) (e.g., 50 and 50A). When imaging data is to be stored, at whatever sight on the network 10, the associated identification data is captured by and integrated into the one site on IMS server 40.

The identification data stored on IMS 40 is accessed and viewed by a user in order to subsequently access imaging data stored at the multiple sites (e.g., sites 1 and 1A, see Fig. 1) on the

4

network 10. As a result, in the claimed invention, only one server 40 at one location 1 is queried in order to locate imaging data stored at any location on the network 10. Identification data is not moved around and temporarily stored in another place such as a temporary database. Identification data is not stored with the imaging data. The imaging data may be accessed and displayed for viewing at any site on the network 10.

In the claimed invention, only one server 40 at one location 1 is queried for identification data in order to locate imaging data stored at any location on the network. As a result, the claimed invention allows imaging data to be stored at multiple locations on a network, without having to query those multiple locations to find a particular set of imaging data as does Killcommons, and without having to provide a query image, compute a similarity measure, and move pointers to a temporary location, as does De Bonet.

Based on at least the foregoing, Applicants believe and respectfully submit that the rejection of claim 1 as being unpatentable over Killcommons and De Bonet has been overcome and should be removed.

With regard to the rejection of claim 9 being unpatentable over Killcommons and De Bonet set forth in paragraph 4 of the Office Action, Applicants respectfully submit that at least the same foregoing reasons set forth for claim 1 overcome the rejection and, therefore, the rejection should be removed.

With regard to the rejection of claims 2-4, 6-8, 10-12, and 14-16 being unpatentable over Killcommons and De Bonet set forth in paragraph 4 of the Office Action, Applicants respectfully submit that at least the same foregoing reasons set forth for claims 1 and 9 above overcome the rejection and, therefore, the rejection should be removed because claims 2-4 and 6-8 are dependent on claim 1, and claims 10-12 and 14-16 are dependent on claim 9.

With regard to the rejection of claims 5 and 13 being unpatentable over Killcommons and De Bonet as applied to claim 4 and further in view of Computer Dictionary, Third edition, Microsoft Press, 1997, ISBN 1-57231-446-X, p. 462 set forth in paragraph 5 of the Office Action, Applicants respectfully submit that at least the same foregoing reasons set forth for claims 1 and 9 above overcome the rejection and, therefore, the rejection should be removed because claims 5 and 13 are dependent on claims 1 and 9, respectively.

In view of the foregoing, it is respectfully submitted that the pending claims 1-16 define allowable subject matter. A favorable action on the merits is respectfully requested.

Should anything remain in order to place the present application in condition for allowance, the Examiner is kindly invited to contact the undersigned at the telephone listed below.

Please charge any additional fees or credit overpayment to Applicants' Deposit Account 502401.

Respectfully submitted,

Date: April 22, 2003   By: _____

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